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**From:** Richard, Ann [Richard.Ann@epa.gov]  
**Sent:** 3/4/2019 10:00:15 PM  
**To:** Grulke, Chris [Grulke.Chris@epa.gov]  
**Subject:** def

Even the designation "PFAS" is somewhat problematic it seems. I found the following definition on Wikipedia:

A **perfluorinated compound (PFC)** per- or polyfluoroalkyl chemical is an organofluorine compound containing only carbon-fluorine bonds (no C-H bonds) and C-C bonds but also other heteroatoms. PFCs have properties that represent a blend of fluorocarbons (containing only C-F and C-C bonds) and the parent functionalized organic species.

Strictly speaking, lots of the PFAS chemicals we are including in our lists are not entirely fluorinated. For instance, all the fluorotelemers have 1-3 (or more) hydrogenated carbons separating the perfluoroalkyl chain from the functional group(s). So, even here, the term PFAS could be considered a bit sketchy. I also have been applying the term "perfluoro" to the fully fluorinated alkyl chains portion of the chemical in trying to come up with more digestible and easily interpreted names. I've found that the on-line name-to-structure programs (like OPSIN) can interpret this, so I think this is acceptable nomenclature.